

Comments Requiring Further Discussion
Draft Final Radiological Addendum to the Parcel E Feasibility Study Report

EPA Comment 1, Section 4.2.2.1, Scoping and Characterization Surveys: EPA understands that pursuant to this section, in conjunction with Table 9, Alternatives R-2 and R-3 include a component consisting of a full MARSSIM survey (consistent with the HRA) to identify areas with elevated radioactivity using the same protocols including soil testing (typically 18 samples per Survey Unit) and comparison against the HPNS concentration based remediation goals (RGs) that the Navy has been using for its radiological program elsewhere in the HPNS. Please confirm this assumption and edit the subject document to reference the protocols the Navy intends use for the scoping and characterization surveys (with the understanding that the Navy may modify these protocols in the future as appropriate with Regulatory agency approval).

EPA Comment 2B, Section 4.2.2.2, Soil, Sediment, and Debris Removal: EPA understands that throughout Parcel E, including IR-02 and IR-03, the Navy will endeavor to excavate, characterize, and remove all soil, sediment, and debris containing radionuclides of concern at concentrations exceeding RGs as specified in Table B-3. However, at IR-02 and IR-03 it is possible that excavation deeper than 1 foot bgs will be limited by risk-based protocols that will allow soil with concentrations marginally greater than RGs to be contained under a 2 foot or 3 foot soil cover (per alternatives R-2 and R-3) if such residual concentrations meet a background dosage (based on a residential scenario) at the ground surface. EPA understands that the Navy will work closely with the Regulatory agencies to develop this risk-based protocol and it will be based on the RESRAD model (or other model acceptable to the Regulatory agencies) during the Parcel E remedial design phase.

EPA Comment 3A, Section 4.2.2.6, Soil Cover, Shoreline Protection, and Institutional Controls (IR 02 and IR 03 only): EPA does not consider the 15 mrem/year dosage to be necessarily representative of residential scenario background dosage at HPNS, but as a supplemental maximum not-to-exceed criteria. Navy cleanups to date at HPNS have actually achieved much better results than the 15 mrem/year dosage criteria and the subject document should clarify this point.

EPA Comment 3B, Section 4.2.2.6, Soil Cover, Shoreline Protection, and Institutional Controls (IR 02 and IR 03 only): EPA is primarily interested in concentration-based cleanups that will result in combined, cumulative residual risk in the 10⁻⁴ to 10⁻⁶ risk range as described by the NCP. Please explain how the Navy's approach in Parcel E will ensure that overall residual risk is maintained within the required NCP risk range.

EPA Comment 9, Table B-3, Release Criteria for Radionuclides of Concern: Per Table B-3, EPA understands that the Navy is applying residential remedial goals (RGs) for all Parcel E areas. The RGs in Table B-3 are consistent with past Navy RODs and EPA radiological preliminary remediation goals per EPA's radionuclide PRG calculator except for Ra-226 which is 1 pCi/g above background (per agreement with EPA). Does the Navy update its radiological remedial goals if changes to the EPA radionuclide calculator are made? Can the Navy's back-up calculations for these RG's be made available and referenced in the final version of the FS?